

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)		Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)		Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)		Jury Demand
SOUTHERN BAPTIST CONVENTION,)		
)	
Defendants.)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Rules 5.03 and 7.01 of the Local Rules of Court and the Second Amended Agreed Protective Order previously entered in this action (ECF Doc. No. 153), Plaintiff Johnny M. Hunt respectfully submits this Motion for Leave to File Under Seal the unredacted version of Exhibit A to his Notice of Filing filed on May 16, 2024 (Doc. No. 198). The redactions in Exhibit A to the referenced Notice of Filing remove Plaintiff's username and the serial number of Plaintiff's phone. Since a redacted version of the aforementioned exhibit is otherwise publicly filed with the Notice of Filing, and the redactions only remove Plaintiff's username and the serial number of Plaintiff's phone, Plaintiff submits his requested seal is narrowly tailored to keep only the highly confidential information under seal while allowing the public to view all non-confidential information in the concurrently filed redacted version.

For the foregoing reasons, this Court should grant the instant motion and permit the unredacted version of Exhibit A to Plaintiff's Notice of Filing filed on May 16, 2024 (Doc. No. 198) to be filed under seal.

Dated: May 16, 2024

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be electronically filed with the Clerk of the Court on May 16, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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